

# WASHINGTON ASSOCIATION OF SHERIFFS & POLICE CHIEFS

3060 Willamette Drive NE Lacey, WA 98516 ~ Phone: (360) 486-2380 ~ Fax: (360) 486-2381 ~ Website: [www.waspc.org](http://www.waspc.org)

*Serving the Law Enforcement Community and the Citizens of Washington*



October 14, 2015

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Room TW-A325  
Washington, DC 20554

**Re: *Ex Parte* Communication  
WC Docket No. 12-375; Inmate Calling Services (ICS)**

Dear Ms. Dortch:

The Washington Association of Sheriffs and Police Chiefs hereby files an *ex parte* communication in connection with the above-referenced proceeding. The purpose of this filing is to submit additional information in support of NSA's position that Sheriffs must be allowed to recover their costs if ICS services are to continue to be widely available in jails, and to urge the Commission to provide a reasonable transition period for jails.

The Washington Association of Sheriffs and Police Chiefs agrees with the comments and reply comments filed by the National Sheriffs' Association in this proceeding, and urges the Commission to conform its actions consistent with the recommendations of the National Sheriff's Association.

The Washington Association of Sheriffs and Police Chiefs further emphasizes the following points:

1. The Washington Association of Sheriffs and Police Chiefs does not believe the Commission has jurisdiction over interstate calling services;
2. The Washington Association of Sheriffs and Police Chiefs does not believe the Commission has jurisdiction over online calling services;
3. The Washington Association of Sheriffs and Police Chiefs does not believe the Commission's recommended rates for ICS would effectively cover the costs of such services, and that such a rate structure, if implemented, would jeopardize the viability of the ICS market and leave many jails without the ability to provide calling services to their inmates; and
4. The Washington Association of Sheriffs and Police Chiefs believes that the Commission's proposed 90 day implementation period is unreasonable, and would recommend a transition period not less than two years.

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If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "Casey Salisbury". The signature is written in a cursive, flowing style.

Casey Salisbury  
Sheriff, Mason County (WA)  
President, Washington Association of Sheriffs and Police Chiefs

CS:dg

cc:   National Sheriff's Association  
      U.S. Senator Patty Murray  
      U.S. Senator Maria Cantwell  
      U.S. Congresswoman Suzan DelBene  
      U.S. Congressman Rick Larsen  
      U.S. Congresswoman Jamie Herrera Buetler  
      U.S. Congressman Dan Newhouse  
      U.S. Congresswoman Cathy McMorris Rodgers  
      U.S. Congressman Derek Kilmer  
      U.S. Congressman Jim McDermott  
      U.S. Congressman Dave Reichert  
      U.S. Congressman Adam Smith  
      U.S. Congressman Denny Heck